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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:
*C.F., on behalf of minor A.K. v. Meta
Platforms, Inc., et al., 4:23-cv-4682*

*S.R., on behalf of minor S.L. v. Meta
Platforms, Inc., et al., 4:23-cv-05097*

**DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THE DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT
OF PLAINTIFFS' SIXTH *EX PARTE*
APPLICATION FOR APPOINTMENT
OF GUARDIANS *AD LITEM***

1 I, Jennie Lee Anderson, do hereby declare and state as follows:

2 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted
3 to practice before the courts of the State of California and in the Northern District of California. I
4 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*
5 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of
6 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I
7 make this declaration of my own personal knowledge and, if called as a witness, I could and
8 would testify competently to the matters stated below.

9 2. I make this declaration in support of Plaintiffs' Administrative Motion to File
10 Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Sixth *Ex*
11 *Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative Motion to Seal").

12 3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on
13 February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs
14 seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of
15 Plaintiffs' Sixth *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson
16 Declaration").

17 4. True and correct copies of the following Exhibits to the Anderson Declaration
18 are as follows and attached hereto:

- 19 • *C.F., on behalf of minor A.K. v. Meta Platforms, Inc., et al.*, 4:23-cv-4682
20 (Exhibit 1)
- 21 • *S.R., on behalf of minor S.L. v. Meta Platforms, Inc., et al.*, 4:23-cv-05097
22 (Exhibit 2)

23 5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, I asked for, and Defendants
24 agreed to, a standing stipulation that the individual applications seeking appointment of guardians
25 ad litem in these cases may be filed under seal. Liaison Counsel for Defendants also confirmed
26 that, in so stipulating, Defendants do not waive, and expressly reserve, their right to seek an order
27 or orders in the future to unseal individual applications and/or require parents who wish to
28 proceed pseudonymously going forward make a showing of good cause.

1 I declare under penalty of perjury pursuant to the laws of the United States of America that
2 the foregoing is true and correct.

3
4 Dated: November 1, 2023

Respectfully submitted,

5 /s/Jennie Lee Anderson
6 Jennie Lee Anderson
7 *Plaintiffs' Liaison Counsel*

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